



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

September 15, 2005

EPA Region 5 Records Ctr.



237673

Ms. Shari Kolak
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Dear Ms. Kolak:

SUBJECT: Willow Boulevard/A-Site Operable Unit, Allied Paper Inc./Portage
Creek/Kalamazoo River Superfund Site

Thank you for the opportunity to comment on the proposed cleanup plan for the Willow Boulevard/A-Site Operable Unit (OU). The purpose of this letter is to formally submit the comments of the Michigan Department of Environmental Quality (MDEQ), Superfund Section, relative to the proposed plan.

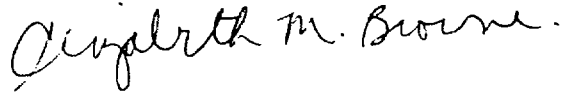
The MDEQ agrees with the evaluation and comparison of the cleanup options against the evaluation criteria, and that Alternative 2 consisting of consolidation and containment (source control) of polychlorinated biphenyl (PCB) contaminated material is the best choice for remedial action at this OU. Three bank stabilization options (referred to as Alternatives 2A, 2B, and 2C) were evaluated for Alternative 2 and the United States Environmental Protection Agency (USEPA) has selected Alternative 2C as the preferred remedy. Alternative 2C includes consolidation and containment of PCB-contaminated materials creating a buffer zone from the Kalamazoo River at the Willow Boulevard Landfill portion of the OU, and re-grading and stabilizing the riverbank using ecological friendly options at the Willow Boulevard Landfill to restore the riverbank and improve habitat quality. Alternative 2C allows the sheetpiling currently in place along the A-Site Landfill portion of the OU to remain. Additionally, long-term maintenance, institutional controls to restrict public access, and groundwater monitoring would be implemented.

Alternative 2C meets the criteria; however, there is opportunity to better meet the restoration goals of the Kalamazoo River Trustee Council (Trustees) during the implementation of remedial action at this OU. The Trustees have submitted comments and proposed an additional source control remedy that they have defined as Alternative 5, which combines elements of Alternatives 2B, 2C, and Alternative 4. The MDEQ, Superfund Section supports the alternative proposed by the Trustees in an effort to most efficiently combine remediation and restoration goals.

Lastly, it is understood that groundwater monitoring will be conducted as part of any remedy eventually selected and that if long-term monitoring shows contaminants above applicable criteria, the impacts to groundwater will have to be addressed to prevent impacts to surface water. Eliminating impacts from groundwater, if present, are crucial in order for the selected remedy to meet the evaluation criteria.

Should you have any questions in regard to these formal comments, please contact Mr. Keith Krawczyk at 517-335-4103, or you may contact me.

Sincerely,

A handwritten signature in cursive script, reading "Elizabeth M. Browne".

Elizabeth M. Browne, Chief
Superfund Section
Remediation and Redevelopment Division
517-335-4920

cc: Ms. Nan Leemon, MDEQ
Ms. Daria W. Devantier, MDEQ
Ms. Judith Gapp, MDEQ
Mr. Keith Krawczyk, MDEQ